061571

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OU: 300-FF-2
TSD: 300 WATS (TS-3-1)
ERA: N/A
Subject Code: 8280

Environmental Restoration Contractor **ERC Team**

Meeting Minutes

SUBJECT **RCRA/CERCLA Interface for Closure of the 300 Area Waste Acid Treatment System**

TO Distribution

FROM L. C. Hulstrom LC Hulstrom

DATE September 3, 1998

ATTENDEES

N. A. Ballantyne N1-26
C. E. Corriveau H0-17
G. P. Davis B5-18
D. R. Einan B5-01
R. L. Guillen L1-03
L. C. Hulstrom H9-03
S. N. Luke H6-24
E. M. Mattlin A5-15
R. G. McLeod H0-12
J. A. Remaize L6-26
D. W. Templeton R3-79
J. J. Wallace B5-18
C. D. Wollam R3-56

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Attendees
Document and Information Services H0-09

A meeting was held on September 3, 1998, in the conference room at the U.S. Environmental Protection Agency in Richland, Washington, to discuss several RCRA/CERCLA integration issues. The meeting was attended by the U.S. Department of Energy, Richland Operations (RL), the Environmental Restoration Contractor (ERC), the U.S. Environmental Protection Agency, the Washington State Department of Ecology, and several Project Hanford Management Contractor (PHMC) representatives.

The following topics were discussed:

S. Luke presented a handout (Attached) proposing 'partial' RCRA closure of the 300 Area Waste Acid Treatment System (WATS) RCRA TSD. This would include transition of WATS from EM-60 to EM-40 to complete disposition of "unclosed" soils in conjunction with the 300-FF-2 CERCLA OU remedial action and to complete WATS RCRA closure. The handout also identified the RCRA/CERCLA interfaces associated with the transition. After the presentation, RL (R. G. McLeod) asked for regulatory concurrence with the approach. Both the EPA (D. R. Einan) and Ecology (G. P. Davis) noted that they accepted the approach. Ms. Davis indicated that she wanted to review the outstanding WATS NODs related to the 313 South and the WATS and U-Bearing Piping Trench (WUPT) to verify that the proposed WATS transition resolved the NODs. A response from Ecology was anticipated by September 8.

Other subjects discussed briefly included the following:

1) PHMC staff updated attendees on the status of the 300-FF-2 waste site dispositioning task that has been initiated. This same process that has been recently completed for PNNL waste sites in the 300-FF-2 OU was also briefly discussed by ERC staff.
2) The issue of uranium as related to the 303K Contaminated Waste Storage facility was discussed. It remains RL's position that Ecology does not have authority over uranium. This issue is to be elevated to higher levels (possibly the IAMIT meeting) for further discussion and resolution.

The following action items were accepted:

1) G. Davis would respond to S. Luke as to whether the proposed approach for 300 WATS satisfied the outstanding NODs by September 8, 1998.

The following agreements were made:

By signature given below, the following parties agree to 'partial' closure of WATS as presented in the attachment. Transition of the unit to EM-40 for completion of RCRA closure will occur once endpoint criteria are agreed to and have been met.

Robert G. McLeod Sept. 21, 1998
R. G. McLeod, RL 300 Area Project Manager

Joanne J. Wallace 9/24/98
J. J. Wallace, Ecology 300 Area Project Manager

David R. Einan 24 sept 98
D. R. Einan, EPA 300 Area Project Manager

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RCRA/CERCLA INTERFACE FOR 300 AREA WASTE ACID TREATMENT SYSTEM CLOSURE

September 3, 1998

- **Purpose**

  Summarize WATS locations and workscope that will be transitioned from EM-60 to EM-40 for completion in conjunction with the 300-FF-2 CERCLA Operable Unit (OU) remedial action.

- **Background**

  - WATS is clean closing above-ground structures and components in 3 phases over 3 years (planned completion 1999). Phase 1 is complete and accepted, Phase 2 is complete and under approval, Phase 3 (1999) is in planning.

  - Most soils will close based on no potential impact from RCRA operations. Soils that will not close are areas of past-practice, contamination impacted by WATS operations - the 313 South and the WATS and U-Bearing Piping Trench (WUPT).

- The '313 South' is a room of the 313 Building that has documented, subfloor contamination from past-practice activities (WIDS UPR-300-038) of the Uranium-Bearing System (UBS).

- The WUPT is a covered, concrete trench constructed in 1961 between multiple 300 Area structures to hold UBS piping and perchlorethylene (PCE) piping (See sketch).

. West portion (333 to 313 Building) slopes down to 313 and was constructed with weep holes to the soil.

. In 1974 trench was reported as contaminated with uranium and as having severely eroded process sewer connections (UPR-300-040).
. WATS piping was added to trench in 1975 and carried similar, radioactive acids as the UBS.

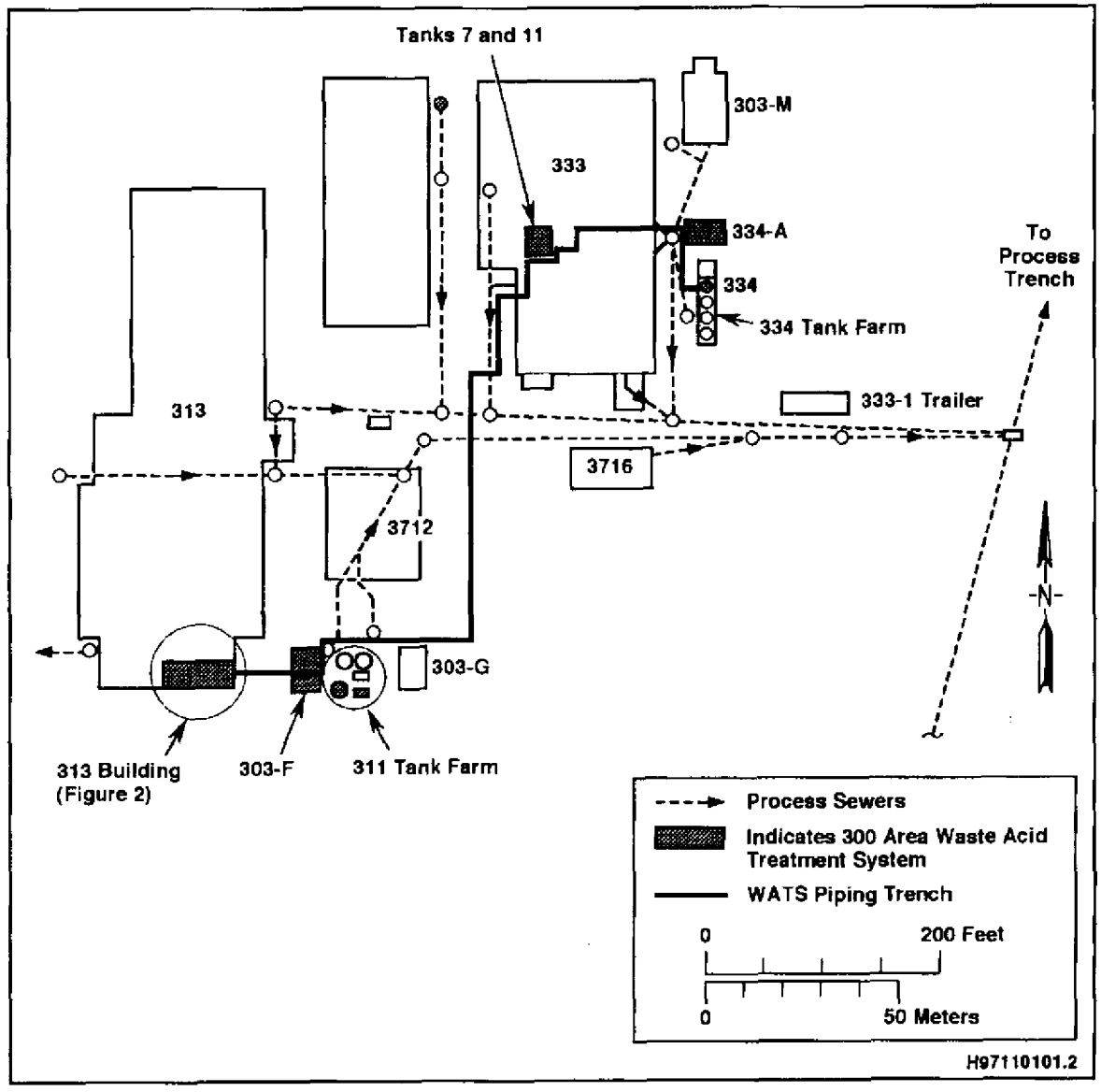
. A 380 gallon, non-WATS PCE release occurred in 1981 (UO-81-1).

. WATS only releases to the west WUPT came later in 1985 and 1987 - 2 minor spills to an already contaminated location.

- RL programs EM-40 and EM-60 RL have agreed that it is more appropriate and cost-effective for the OU to disposition the locations. The WATS path forward will be:

. After WATS Phase 3 closure WATS will undergo "partial closure"

. After completion of Endpoint criteria, the closure plan and open Part A will be transitioned from EM-60 to EM-40 to complete soil disposition and WATS RCRA closure.


Tanks 7 and 11
303-M
333
334-A
334
334 Tank Farm
To Process Trench
333-1 Trailer
313
3716
3712
303-G
313 Building (Figure 2)
303-F
311 Tank Farm
-N-
Process Sewers
Indicates 300 Area Waste Acid Treatment System
WATS Piping Trench
0
200 Feet
0
50 Meters
H97110101.2

- **Rational for Transitioning WATS to EM-40**

  - Past-practice and WATS constituents are so similar that sampling can't differentiate between RCRA and past-practice contamination at the 313 South and the WUPT.

  - To avoid duplication of effort, characterization should meet both units' needs and so should follow the 300-FF-2 OU remedial action schedule - come after the 300-FF-2 OU ROD and after transition to EM-40.

  - Investigative CERCLA sampling would address both units' concerns whereas RCRA sampling would be limited to WATS locations and constituents of concern only.

  - D&D of 313 South and the WUPT will use in-process field screening and sampling - not extensive characterization sampling - to direct soil/structure removal and disposal. This sampling would be used to verify RCRA closure saving approximately $40K.

- No imminent health or environmental risks drive immediate investigation since 300-FF-2 LFI has identified 300-FF-2 OU waste sites as 'low-priority' based on risk. Also, WATS systems will be removed or clean closed with no potential for leaks.

- **RCRA/CERCLA Interface for WATS Transition/Closure**

  - Before transition EM-60 will:

    . Meet clean closure standards from 'floor up' at WATS locations

    . Remove all WATS (and other) piping from the WUPT

    . Identify transitioned workscope in the closure plan and in WIDS.

    . After Phase 3, modify closure chapter of Permit and WATS Part A to reflect WATS "partial" closure status, clean closed locations, and "unclosed" soils.

- After transition to EM-40:

. RCRA unit to support DQO for CERCLA sampling at WUPT and 313 South so data supports RCRA closure.

. After remedial action:
  . PE to certify closure activities
  . Modify WATS Permit to:
    - reconcile CERCLA cleanup to a RCRA closure method (i.e., clean or modified)
    - reference CERCLA work/verification documents
    - provide for any postclosure activities if clean closure not achieved
  . Close out the WATS Part A.

• Regulator Acceptance

- EPA and Ecology agree with the above-described WATS transition so that RL can proceed with its implementation.

- Ecology agrees that the above-described WATS transition resolves WATS closure plan NODs for the 313 South and WUPT so that RL can proceed with revising the WATS closure plan accordingly.

CCN # 061571

CHRONED BY: mJones DATE: 9-30-98

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